

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Crim. No. 11-524
	:	
CHARLES F. HAUX	:	

ORDER

AND NOW, TO WIT, this ____ day of _____, 2011, upon consideration of the Unopposed Motion of the Defendant for a Continuance and for a Speedy Trial Exclusion, it is hereby

ORDERED

that the Motion is GRANTED and the trial of this matter is continued from December 6, 2011 to _____.

The Court finds that, under Section 3161(h)(8)(A), based upon its consideration of the factors set forth in Section 3161(h)(8)(B)(ii) and its conclusion that the case is so sufficiently unusual, complex and document intensive due to the nature of the factual questions, that it is unreasonable to expect adequate defense preparation for ongoing trial proceedings within the time limits contemplated by 18 U.S.C. Section 3161, specifically, that the parties need additional time for the purpose of conducting further plea discussions. Thus, the period from this date to January 3, 2012 is excluded under the Speedy Trial Act.

By the Court:

Jones, J.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
 :
 v. : Crim. No. 11-524
 :
 CHARLES F. HAUX :

UNOPPOSED DEFENSE MOTION FOR A CONTINUANCE OF
TRIAL AND FOR A SPEEDY TRIAL EXCLUSION

Defendant Charles F. Haux, through his undersigned counsel, hereby moves to continue the trial date from December 6, 2011 to approximately January 3, 2012 on the ground that additional time is needed conduct plea discussions.

In addition, the defendant respectfully requests that the Court exclude the intervening period from the calculation under the Speedy Trial Act on the grounds that, due to the nature of the case and its documentation, that it is unreasonable to expect adequate defense preparation for the trial proceeding within the time limits contemplated by 18 U.S.C. Section 3161; specifically, the need for more time to discussion the matter of stipulations of fact in a plea agreement, particularly dealing with relevant conduct.

The government has informed me that I may represent that the government does not oppose this motion.

Respectfully submitted:

/s/

Robert E. Welsh, Jr.
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2000 Market Street, Suite 2903
Philadelphia, PA 19103
(215) 972-6430

Attorney for Defendant Charles F. Haux

Date: November 29, 2011

CERTIFICATE OF SERVICE

I, Robert E. Welsh, Jr., hereby certify that on this date I delivered by electronic means a true and correct copy of the foregoing Unopposed Motion for a Continuance of Trial and for a Speedy Trial Exclusion to the following counsel:

AUSA Richard J. Zack
United States Attorney's Office
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106

/s/
Robert E. Welsh, Jr.

Dated: March 28, 2011